

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

V.

ELSA SKINNER MORGAN, ET AL,

Defendants.

Civil Action No. 1:00-CV-00424

Judge Weber

) **SETTLING GENERATOR/
) TRANSPORTER DEFENDANTS’
) MOTION FOR AN ORDER TO SHOW
) CAUSE WHY PHARMACIA
) CORPORATION SHOULD NOT BE
) HELD IN CONTEMPT FOR
) FAILING TO COMPLY WITH
) CONSENT DECREE**

Settling Generator/Transporter Defendants¹ move this Court for an order directing Pharmacia Corporation to appear before the Court and explain why it should not be held in contempt of the Consent Decree entered by this Court on April 2, 2001, for refusing to finance the remediation of the Skinner Landfill in accordance with paragraph 6.a. of the Consent Decree. Additionally, the Settling Generator/Transporter Defendants move the Court for an order requiring Pharmacia Corporation to reimburse them for the costs and attorneys' fees associated with bringing this matter before the Court.

¹ The moving Settling Generator/Transporter Defendants are Anchor Hocking Corporation, Chemical Leaman Tank Lines, Ford Motor Company, GE Aircraft Engines, General Motors Corporation, Henkel Corporation, King Wrecking Company, Inc., OXY USA Inc., The Dow Chemical Company and Velsicol Chemical Corporation.

Respectfully submitted,

/s/ Michael J. O'Callaghan

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Attorneys for Settling Generator/Transporter
Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the Settling Generator/Transporter Defendants' Motion For An Order To Show Cause Why Pharmacia Corporation Should Not Be Held In Contempt For Failing To Comply With Consent Decree has been served by ordinary U.S. mail, postage prepaid this 10th day of May, 2004 upon:

Pharmacia Corporation
c/o CT Corporation System
1300 East Ninth Street
Cleveland, OH 44114

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/s/ Michael J. O'Callaghan
An Attorney for the Settling
Generator/Transporter Defendants